

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Amendment of Part 97 of the Commission's</b>	)	<b>RM-10809</b>
<b>Amateur Service Rules to Eliminate</b>	)	
<b>Morse Code Testing</b>	)	
	)	
<b>To: The Commission</b>	)	

**COMMENTS TO THE PETITION**

**Concerning the Morse Code**

I disagree with the petition inasmuch as the petitioners seem not to understand the reason for Morse testing and why it is or is not of relevance to the Amateur Service. The retention of Morse Code testing for any class of Amateur Radio license serves no apparent purpose, and all such testing should be eliminated at the earliest opportunity. As has been pointed out by others, the only reason a Morse exam was required at all was so that amateur radio operators could understand instructions from government stations to cease operating if they were interfering with traffic involving safety or other critical communications, and only then because everyone, amateur and commercial, was using spark transmitters. Spark is gone, thousands of stations can operate at the same time without interference, and the military no longer needs the services of thousands of trained Morse code operators.

**Concerning VEC Qualifications**

I believe the present system of certification and acceptance for volunteers is satisfactory. The fact that there have been serious problems with the VEC program in the petitioners area is no reason to inflict draconian record keeping requirements on the remaining volunteer examiner coordinators. I believe that most VEC's already have established satisfactory certification and record keeping practices, designed to fit their own needs, and there has been no demonstrated case of failure in this regard, of which I am aware, among the VEC's active in other areas.

**Examination content and retesting**

Petitioner states that the VEC system could allow an exam to be administered where all questions were from one subsection of the question pool. I know of no responsible VE that would allow such practice, and the guidelines established by the NCVEC and the question pool committee are quite clear in this issue.

Petitioner also suggests that immediate retesting be prohibited. As long as the requirement that the applicant not be given the same exam more than once during a session, where is the problem? If the VE team has the time, and the applicant is otherwise willing to continue, why not allow it? Many applicants have traveled long

distances to attend an exam session, and refusing immediate retesting is unnecessarily restrictive and perhaps counterproductive. Telling someone to “go home and study some more” could be perceived as insulting or derogatory, and may serve to enhance impressions that Amateur Radio enthusiasts are guilty of elitism, or worse. The original reason for requiring a long (30 day) wait between attempts by an applicant derived in part from the relative paucity of unique exams available to the FCC. With current technology, hundreds or thousands of unique exams can be created on demand by any number of available software packages. The likelihood of an applicant receiving identical exams is miniscule, and not worth consideration. Even among those VEC’s that use previously prepared paper exams, every one of which I am aware has a stock of at least 20 different exams per element, and in those cases, the questions are carefully chosen so as to reduce “repeats” as much as is possible.

**Amateur Radio emergency communications and the Morse code.**

The petitioners argument that Morse code is of primary importance for emergency communications is obsolete and essentially baseless. They state that “knowledge of the Morse code is needed in order to maintain a reliable emergency communications service ...” and “computers and other sophisticated equipment are not available or inadequate”. While it is true that “normal” infrastructure can be damaged by natural events, they neglect to mention that essentially all of these communications are accomplished using voice or “keyboard” transmissions, frequently with equipment dedicated to such use and operated by ARES or RACES teams. In disasters involving hurricanes and similar issues, the FCC frequently sets aside specific frequencies on the HF voice bands, but only very rarely for the CW bands. We have satellites, repeater stations, packet radio, and more, most of which were not available until relatively recently. In emergencies, anyone can use a microphone or a keyboard. The same is not true of a Morse code set.

**Personal information:** I joined the ranks of Amateur Radio licensees with a Novice license in 1959, and have been licensed continuously since that time. I have held an Amateur Extra Class operator license since August of 1976. I have also held a FCC Commercial radio operator license since 1963, originally a First Class Radiotelephone, with Ship Radar and Aircraft endorsements, it was modified to a General Radiotelephone Operators License when all such licenses were converted several years back. I am a life member of the American Radio Relay League (ARRL) and the Vice Chairman of the National Conference of Volunteer Examiner Coordinators (NCVEC).

Respectfully submitted,

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